

FILED USDC - CLERK DET
2018 APR 3 PM 2:19

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

No. 17-cr-20406

HON. PAUL D. BORMAN

v.

Violation: **Misprision of a Felony** (18
U.S.C. § 4)

D-7 MICHAEL BROWN,

Defendant.

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FIFTH SUPERSEDING INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE
(18 U.S.C. § 4 – Misprision of a Felony)

D-7 MICHAEL BROWN

On about December 16, 2015, in the Eastern District of Michigan, Southern Division, the defendant, (D-7) MICHAEL BROWN, having knowledge of the actual commission of the felony of conspiracy to violate the Labor Management Relations Act, in violation of 18 U.S.C. § 371, a conspiracy whereby Fiat Chrysler Automobiles US LLC (FCA) executives acting in the interest and on behalf of FCA conspired with one another, with FCA, with officials of the International United Automobile, Aerospace, and Agricultural Implement Workers of America (UAW),

and with the UAW to provide prohibited payments and things of value to UAW officials, did conceal the same by deliberately providing misleading and incomplete testimony in the federal grand jury about the conspiracy, and did not as soon as possible make known the same to some judge or other person in civil or military authority under the United States, all in violation of Title 18, United States Code, Section 4.

MATTHEW SCHNEIDER
United States Attorney

/s/ David A. Gardey
David A. Gardey
Assistant United States Attorney
Chief, Public Corruption Unit

/s/ Bruce C. Judge
Bruce C. Judge
Assistant United States Attorney

/s/ Charles J. Kalil II
Charles J. Kalil II
Assistant United States Attorney

/s/ Erin S. Shaw
Erin S. Shaw
Assistant United States Attorney

Dated: April 3, 2018

ORIGINAL

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 17-cr-20406
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>CSK</i>

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2018 APR 3 PM 2:19Case Title: USA v. Jerome Durden, et al.County where offense occurred : Wayne County and Oakland CountyCheck One: ☒ Felony☐ MisdemeanorFILED USDC - CLERK DET
2018 APR 3 PM 2:18☐ Indictment/ ☐ Information --- no prior complaint.☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]☐ Indictment/ ☒ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below]**Superseding Case Information**Superseding to Case No: 17-cr-20406Judge: Paul D. Borman

- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☒ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
D-7 Michael Brown	18 U.S.C. § 4	

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

April 3, 2018
Date



Charles J. Kalil II
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Attorney Bar #:

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.